

EXHIBIT 10

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

CHELSEA GILLIAM, *et al.*,

*

Plaintiffs,

*

v.

Civil Action No. 1:23-cv-1047

*

DEPARTMENT OF PUBLIC SAFETY
AND CORRECTIONAL SERVICES, *et al.*,

*

Defendants.

* * * * *

DECLARATION OF DAVID LEVI MILLS

I, David Levi Mills, testify to the following:

1. I am over the age of 18 years old and am competent to testify.
2. I have been incarcerated at North Branch Correctional Institution (NBCI) since August 2023. I was transferred here from WCI.
3. I am housed on the same tier as Ms. Chloe Grey.
4. I am familiar with the Administrative Remedy Process (ARP) and how it functions at NBCI.
5. The ARP is very complicated. You have to ask repeatedly on every shift for the forms. It can take up to two weeks to even get the form from an officer. Not every officer will distribute the forms.
6. It seems sometimes like they purposely delay giving you the necessary forms in the hope that you will forget about the issue.

7. You have to keep reminding the officers to bring you forms or ask other incarcerated individuals if they have extra forms. Sometimes people will save forms because they are so hard to get.

8. You have to go through the same prolonged process to get a continuation form or any other paperwork. The same is true for appeals forms.

9. It is also hard to turn in a form because you have to give it to an officer. I have had officers tell me, "This is not a good shift to turn it in on. You should wait."

10. It takes three weeks to a month to get a response. This is longer than in other prisons in which I have been housed.

11. For example, my tablet broke last year. I have tried to get a replacement and tried to use the ARP process. It does not work. I have not been provided a tablet for about four months. Because of the lack of tablet, I have not been able to communicate with the outside world, including with my children. Still, I have not gotten a helpful response to my ARPs.

12. I have reviewed this declaration with counsel for Chloe Grey and am directing them to sign it for me. I understand that a copy will be mailed to me, inspected by the prison, and given to me to sign and mail back to counsel. That directly signed copy will be provided to the Court as well.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 19, 2024



Lauren A. DiMartino (for David Levi Mills)

Executed on _____, 2024

David Levi Mills